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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**REPORT ON PG&E'S CARIBOU-
PALERMO 115 KV
TRANSMISSION LINE**

Judge: Hon. William Alsup

1 Pacific Gas and Electric Company (“PG&E”) submits the following report to
2 update the Court on the condition of PG&E’s Caribou-Palermo 115 kV Transmission Line (the
3 “Caribou-Palermo Line”).

4 As PG&E previously informed the Court, the Caribou-Palermo Line has been de-
5 energized since shortly after the Camp Fire. (Dkt. 1090.) That de-energization is permanent.
6 However, PG&E has identified a potential residual public safety risk associated with the
7 Caribou-Palermo Line in its de-energized state and submits this report to the Court regarding that
8 risk. As described below, PG&E has taken steps to mitigate this risk and is taking further steps
9 to eliminate it. PG&E also has notified the Federal Monitor and Probation Officer, the
10 California Public Utilities Commission and the Butte County District Attorney of the facts and
11 mitigation efforts set forth in this report.

12 PG&E has determined that energized lines that share towers with the Caribou-
13 Palermo Line or run adjacent to the Caribou-Palermo Line are inducing some level of voltage
14 and current on the Caribou-Palermo Line despite its de-energization. The process by which the
15 electromagnetic field surrounding an energized line can induce voltage and current in a nearby
16 de-energized line is known as “induction”. The Caribou-Palermo Line has the potential for
17 induction because, as PG&E explained in its August 16, 2019 submission to the Court, an
18 approximately 16-mile-long section of the Caribou-Palermo Line that runs south from the Big
19 Bend Switching Station to the Palermo Substation is supported by towers that also support other
20 transmission lines or lower-voltage distribution lines that remain energized. In addition, sections
21 of the Caribou-Palermo Line run parallel to other transmission lines in the same corridors.

22 Based on the fact that the Caribou-Palermo Line was de-energized, PG&E
23 allowed work orders for various conditions on the line to remain open. The concern that PG&E
24 is now working to address is that there is still some voltage and current on the line because of
25 induction from nearby lines. PG&E is taking immediate steps to eliminate or minimize this risk.

26 *First*, PG&E is working to physically isolate the Caribou-Palermo Line into 15
27 different sections and to install protective grounds on each isolated section. PG&E already has
28 isolated and grounded the sections of the line that present a higher risk of induction. PG&E

1 anticipates that it will complete the work to isolate and ground the remaining sections, most of
2 which require helicopter support, by the end of next week. Isolation eliminates the risk that
3 induction on any one section will result in electrical activity on downstream or upstream
4 sections, and grounding each isolated section creates a path for any induced electrical current to
5 go to ground. PG&E's expectation is that once the sections of line are isolated and grounded, the
6 level of electrical activity on each of the 15 sections will be zero or nearly zero. Field
7 measurements taken by PG&E to date confirm that there is minimal electrical activity on those
8 sections of the Caribou-Palermo Line that PG&E has isolated and grounded.

9 *Second*, in addition to isolating the line into sections and grounding each section,
10 PG&E is initiating expedited repairs of high-priority conditions on the Caribou-Palermo Line
11 that were previously not addressed following the permanent de-energization of the line. PG&E
12 also is reviewing any lower-priority work orders to determine whether they have become high-
13 priority conditions since the de-energization of the Caribou-Palermo Line in December 2018,
14 and will reprioritize such conditions for repair as necessary.

15 In addition to these immediate steps, PG&E is preparing to remove the Caribou-
16 Palermo Line's conductor. The removal of the conductor, which is estimated to take at least
17 several months, will permanently eliminate any risk of ignition from induction on the line.

18 Going forward, PG&E will provide regular updates to the Federal Monitor
19 regarding these mitigation efforts, PG&E's progress toward removing the conductor on the
20 Caribou-Palermo Line, why this risk was not addressed earlier when the line was taken out of
21 service or thereafter, and steps PG&E is taking to identify and address any potential ignition
22 risks arising from induction in high fire-threat areas across PG&E's system.

1 Dated: July 24, 2020

Respectfully Submitted,

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